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Plaintiff in Pro Per

6
7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,

11 Plaintiff,

12 vs.

13 RIOT GAMES, INC.,

14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUN

PLAINTIFF'S MOTION IN LIMINE TO
ADMIT EVIDENCE

DATE: FEBRUARY 27, 2025

TIME: 10:00 A.M.

CRTRM: 6D

16
17 JANUARY 29, 2025

Dated this: JANUARY 29, 2025

18
19 *M. WOLSTENHOLME.*

20
21 [MARC WOLSTENHOLME]

22 PSYCHO-EMOTIONAL ANALYSIS OF TRAUMA IN ARCANE AND BLOODBORG,
23 WHICH IS TRAUMA WRITING DIRECTLY REFERENCING THE PLAINTIFF'S PAST
24 AND MY MEDICAL RECORDS.

1 **I. Introduction:**

2 I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se.
3
4 This declaration is made in support of my PLAINTIFF'S MOTION IN LIMINE TO ADMIT
5 EVIDENCE, to submit additional evidence relevant to my claims against Riot Games, Inc. for
6 copyright infringement, unfair competition, and intentional infliction of emotional distress.

7
8 **II. Evidence Submitted:**

9 I submit the following evidence of PSYCHO-EMOTIONAL ANALYSIS OF
10 TRAUMA IN ARCANE AND BLOODBORG, WHICH IS TRAUMA
11 WRITING DIRECTLY REFERENCING THE PLAINTIFF'S PAST AND MY
12 MEDICAL RECORDS. This is not an exhaustive list, but serves to demonstrate
13 key elements of my original work and the substantial similarities between my
14 work and the infringing material produced by Riot Games, Inc.

15
16
17 **III. Comparison of Trauma Writing.**

18
19 This document specifically shows the striking similarities between TRAUMA
20 IN ARCANE AND BLOODBORG, WHICH IS TRAUMA WRITING
21 DIRECTLY REFERENCING THE PLAINTIFF'S PAST AND MY
22 MEDICAL RECORDS.

1 **Detailed Comparison of Bloodborg and Arcane: Alleged Infringement of Trauma Writing**

2

3 **1. Trauma Writing as Therapy and Alleged Infringement**

4

5

6 **Claim from Bloodborg:**

7 Trauma writing is described as a therapeutic process for individuals with PTSD, allowing
8 them to process and regulate trauma.

9 The document asserts that Riot Games directly copied themes, narrative elements, and
10 personal experiences from *Bloodborg*, which were rooted in the author's trauma writing.

11

12

13 **Claim of Harm:**

14 Using the author's personal trauma as a creative foundation for *Arcane* constitutes emotional
15 and psychological harm.

16 The infringement is compared to theft of medication, equating it to stealing essential
17 therapeutic tools.

1 **2. Character and Story Comparisons**
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6 **D'borg vs. Jinx**
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10 **BLOODBORG (D'BORG)**
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12 **D'borg experiences psychotic breaks and
13 struggles with substance regulation.**
14

15 **ARCANE (JINX)**
16

17 Jinx suffers from hallucinations, paranoia,
18 and psychotic episodes due to trauma and
19 drug use (Shimmer).
20

21 **D'borg's transformation from D'anna
22 reflects a traumatic physical and
23 psychological metamorphosis.**
24

25 Jinx's transformation from Powder
26 similarly represents a breakdown caused by
27 loss and guilt.
28

29 **Themes of guilt, aggression, and isolation
30 drive D'borg's behaviour.**
31

32 Jinx's erratic behaviour mirrors these
33 themes, driven by unresolved childhood
34 trauma.
35

1 **Cowboy Momahan vs. Silco**
2
3

4 **BLOODBORG (COWBOY MOMAHAN)**

5 **ARCANE (SILCO)**

6 **Cowboy Momahan is a narcissistic and paranoid
7 gang leader, obsessed with consolidating power
8 over chaotic factions.**

9 Silco exhibits similar traits of
10 narcissism, paranoia, and a drive to
11 control the underworld of Zaun.

12 **Cowboy Momahan's use of inhaled
13 neurotransmitter drugs (Blood-based) to
14 regulate his state mirrors Silco's use of injected
15 substances (Blood-based).**

16 Silco's calculated ruthlessness and
17 delusions of grandeur align with
18 Cowboy Momahan's behaviours and
19 leadership style.

1 **Neva vs. Ambessa Medarda**
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3
4

5 **BLOODBORG (NEVA)**

6 **ARCANE (AMBESSA MEDARDA)**

7 **Neva, a tribal leader, is emotionally
8 detached, having suffered the loss of a child
9 (sabella).**

10 **Neva's spiritual guardians (hyenas)
11 symbolise protection and grief.**

12 **From a higher realm, Neva is gifted a
13 white-eyed child of great importance after
14 losing a baby to an arrow.**

15 Ambessa shows emotional detachment and
16 ruthlessness, reflecting tragic loss and years
17 of hardship.

18 Ambessa's calculated demeanour and
19 relationships reflect similar themes of
20 emotional repression.

21 From a higher realm, Ambessa is gifted a
22 white-eyed child of great importance after
23 losing a baby to an arrow.

1 **Other Character Development and Design Comparisons:**
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3
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5 **Viktor (Arcane) vs. Simon and Roy (Bloodborg):** Both characters display body
6 dysmorphia and obsessive behaviour related to physical transformation.
7
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11 **Caitlyn (Arcane) vs. Josh (Bloodborg):** PTSD flashbacks and moral dilemmas are
12 central to both of these sniper characters' arcs.
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15 **3. Psycho-Emotional Parallels**
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17

18 **Shared Themes of Mental Illness:**
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20

21 **BLOODBORG**
22

23 **ARCANE**
24

25 **Trauma-induced psychosis, paranoia, and**
26 **anxiety dominate character arcs.**
27

28 Jinx's paranoia and hallucinations reflect
unresolved trauma and substance abuse.

29 **PTSD flashbacks and dissociative**
30 **behaviours are detailed through first-person**
31 **narratives.**
32

33 *Arcane* uses visual storytelling to depict
similar psychoses (e.g., Jinx's visions of
her past).
34
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36
37

1 **Substance-Induced Psychosis:**
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5 *Bloodborg*: Substance abuse, is depicted as a maladaptive coping mechanism. Characters
6
7 experience hallucinations and heightened aggression.
8

9
10 *Arcane*: Shimmer is used as a plot device to induce similar psychotic and aggressive
11 behaviours, particularly in Jinx.
12

13 **Circular Narratives and Cyclical Trauma:**
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17 *Bloodborg*: The author uses literary devices like foreshadowing and repetition to convey
18 cyclical trauma.
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21 *Arcane*: Examples like Silco's drowning monologue reflect the same cyclical storytelling
22 style.
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1 **3. Literary and Symbolic Parallels**
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5 **Bridge Symbolism:**

6 **BLOODBORG**

7 **ARCANE**

8 **Bridges represent the divide between the
9 fractured, traumatic mind and the desire for
10 order and normalcy.**

11 Bridges in *Arcane* serve as key
12 locations for pivotal emotional and
13 traumatic events.

14 **The great bridge dumping is a metaphor for
15 shedding trauma to cross into a new phase of
16 life.**

17 Key scenes (e.g., Jinx's transformation)
18 use bridges as symbolic spaces of
19 transition.

20 **Drowning Motifs:**

21 *Bloodborg*: Characters experience drowning or sinking, symbolising the overwhelming
22 nature of trauma.

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28 *Arcane*: Silco's drowning monologue mirrors these themes, using water as a metaphor for
chaos and peace.

1 **5. Key Examples of Alleged Replication**
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5 **Coma Scene (D'anna vs. Jinx and Viktor):**
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10 *Bloodborg:* D'anna's experience waking from a coma is described with vivid sensory
11 details (e.g., the smell of burnt skin, green exit signs, and medical tubes). D'anna's bed is
12 displayed almost vertically. D'anna's coma is the catalyst for her transformation into
13 D'borg.
14

15
16 *Arcane:* Jinx's coma and recovery scene echoes these details, down to the sensory
17 disorientation. Jinx's coma is the catalyst for her transformation into an augmented
18 Shimmer Jinx.
19

20
21 *Arcane:* Viktor is also placed in a coma. Viktor is displayed vertically. Viktor's coma is
22 the catalyst for his transformation into an augmented Jesus Cyborg, then finally into a
23 Bloodborg.
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1 **Trauma-Induced Flashbacks:**
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5 *Bloodborg*: Flashbacks of drowning, burning bodies, and violent memories are recurring
6 themes.
7

8 *Arcane*: Jinx experiences vivid hallucinations and flashbacks tied to her traumatic past.
9
10

11 **Paternal Figures:**
12
13

14 *Bloodborg*: Warwick is a complex father figure, and this is a central theme.
15
16

17 *Arcane*: Jinx's repeated loss of father figures (Vander, Silco) mirrors this cyclical
18 narrative.
19
20

21 **6. Hidden Messages and Symbolism (gaslighting).**
22
23

24 **M.W. Initials in Arcane:**
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27 The document claims that Riot Games included the author's initials (M.W.) in the climax
28 of *Arcane* as a subtle homage or acknowledgment of the source material.
29
30

31 This is presented as evidence of deliberate copying.
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1 **7. Assertions on Damages**
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6 **Emotional and Creative Harm:**
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10 The author argues that Riot Games' alleged use of deeply personal trauma writing
11 exacerbates their PTSD. Retrieving medical records to substantiate the claims adds to the
12 emotional toll.
13

14 **Conclusion:**
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16 This document outlines extensive parallels between *Bloodborg* and *Arcane*,
17 asserting that Riot Games replicated specific narrative elements, character arcs, and psycho-
18 emotional themes. These similarities are rooted in deeply personal trauma writing, and their
19 alleged unauthorised use constitutes both copyright infringement and emotional harm.
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1 EXHIBITS
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5 **Exhibit A – Trauma Writing is Medicine**
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8 **Trauma Writing is Medicine**
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11 People suffering from PTSD use journaling and trauma writing as therapy, to take agency
12 over the past, to make sense of it and to gain control of it. A part of the problem with
13 controlling or regulating trauma and its affects, is that trauma is fracturing and
14 unpredictable. Trauma is tricky, it's strange, it's oblique and foreign to the mind. It
15 manifests in myriads of ways, disorders, emotions and behaviours. one's by writing it
16 down, in journal logs or in fictional stories, the sufferer can begin to make sense of it and
17 gain control over it. Writing also acts as exposure therapy at a safe distance, creating a
18 bridge between ones suffering and their mind.

19 Its standing in the dark and not seeing monsters, it's jumping in the deep end and
20 swimming to safety, it's watching a horror movie, then sleeping like a baby.

21 Thus, stealing one's trauma writing- like Riot Games have done - is the filthiest form of
22 copyright infringement. It constitutes Psycho -emotional abuse and privacy violations. Its
23 stealing one's medication, it's akin to taking one's inhaler away during an asthma attack.
24 Or stealing a wheelchair from a double leg amputee. It's filthy, and their retaliations after,
25 have been even filthier.

26 **Psycho-Emotional Analysis of
27 Trauma in Arcane.
28 Taken from Bloodborg, which is
29 trauma writing directly
30 referencing my past and my
31 medical records.**

32 the money the army paid to the right off car which hit me and flung me into a ditch and left me for dead, placed in a
33 body bag my German police and saved only by a paramedic who came and saw me after and told me I died 6 times
34 in the ambulance.



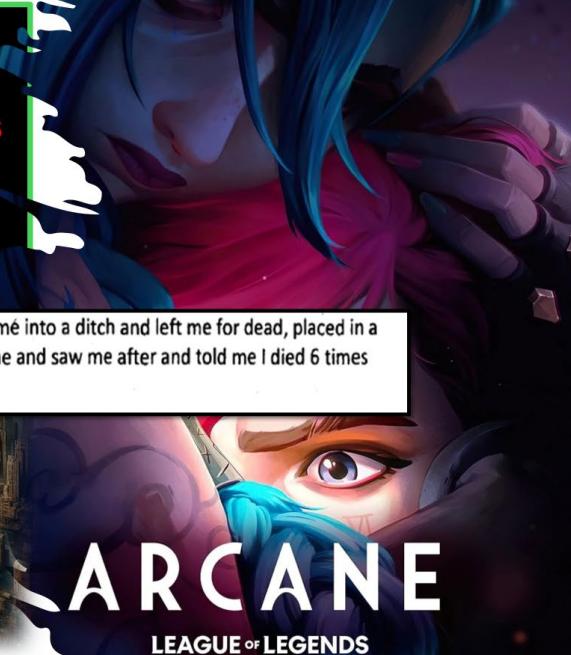
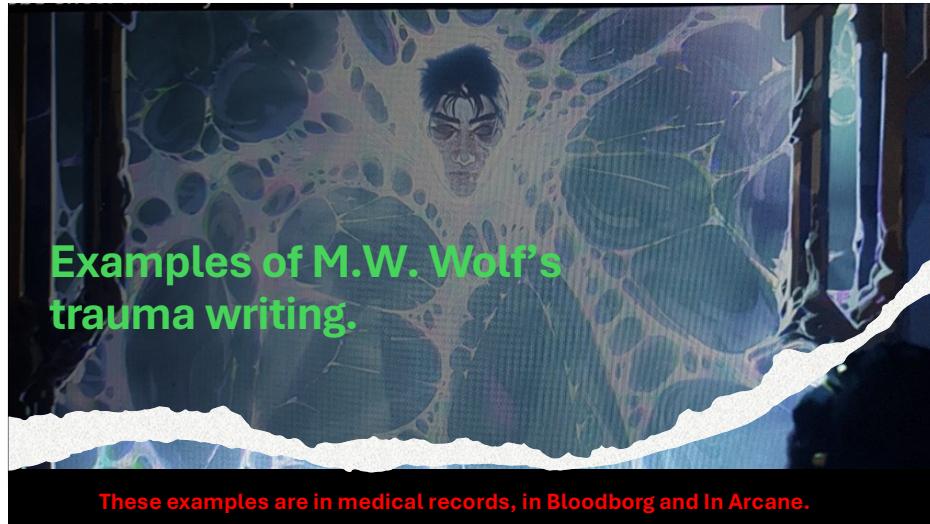
38 
39 ARCANE
40 LEAGUE OF LEGENDS

Exhibit B- Examples of M.W. Wolf's Trauma Writing matched to trauma as it appears in Arcane.



Example 1: Coma

Medical records-

"Imagine waking up, strapped down to a bed in a pitch black room, all you can see is the green light of the exit sign and all you can smell is your burnt skin and the ointment the German doctors have applied to your raw wounds from where the skin has been ripped off from friction burns from bouncing down the autobahn after being hit by a car travelling at speeds of over 120km an hour.
Imagine travelling up and pulling tubes from every orifice of your body and a thick brown sludgy liquid (digested blood) shoots out of your mouth. You are 17 years old in a foreign country, having never been abroad before, and you don't know where you are or what has happened to you."

Bloodbar

"D'anna woke in a warm Hospital bed. The room was pitch dark. A green exit sign shone above the doors far in front of the bed. Her body and head were strapped to the bed. She could only move her right eye. She peered down at her body; it was covered tightly with a white sheet. She couldn't feel her limbs, less for a twinge in her left leg. A plastic breathing mask covered her nose and mouth, sweaty and stale. Under the plastic, another taste lingered. It confused her, she knew the taste but could not remember it, as if her mind was blocking her from remembering. She focused. She remembered! It was... it was... blood and oil."

"D'anna came around again. She had tubes emerging from every orifice. The one protruding out of her mouth, felt warm and wet, like a mother's nipple. She felt warm and cosy, like a baby breastfeeding."

"Her bed was angled up, slanting towards the ground, as if to display her."

first memory he states was waking up in hospital and he was pulling off the tubes attached



D'anna before she is made into
D'borg = Victor before he is made
into a cyborg type character! Jinx
was also saved by drugs in a
coma.

Not even this was written by Linke. It's all Bloodborg. The worst of it is, it's a metaphorical expression of my personal trauma of being in a coma.

1
2 EVER WONDER WHAT IT'S LIKE TO DROWN? STORY
3 OF OPPOSITES. THERE'S PEACE IN WATER. LIKE IT'S
4 HOLDING YOU, WHISPERING IN LOW TONES TO LET
5 IT IN. AND EVERY PROBLEM IN THE WORLD WILL
6 FADE AWAY. BUT THEN, THERE'S THIS THING... IN YOUR
7 HEAD, AND IT'S RAGING. LIGHTING EVERYTHING
8 WITH MADNESS. TO FIGHT. TO SURVIVE. AND
9 THE WHILE THIS QUESTION LINGERS BEFORE
10 "HAVE YOU HAD ENOUGH?" IT'S FUNNY. YOU
11 PASS A LIFETIME WITHOUT EVER FACING A
12 DAY LIKE THAT. BUT IT CHANGES YOU FOREVER.

Example 2: Cyclical Drowning & Falling Scenes

Dying, reliving of trauma and sleep paralysis from my medical records.

"the flight". He states in Iraq an x-ray confirmed that he had broken jaw in two places. He states in Iraq he further suffered injuries to his leg and head. He was told to get out of the

"Around this time, I had begun to panic in my sleep and feel as if I was dying."

"... I experience horrible sleep paralysis where I think I'm fighting..."

"I had some studies done into my sleep disorder."

"I felt heart palpitations when trying to sleep, I was scared to sleep in case I died."

"I got back to the HQ block and tried to sleep. I experience my first sleep paralysis."

...drowning and sinking into the bed.

"...trapping me under in blackness..."

"At this point I was depressed and had a sleeping disorder. Sometimes I would be awake for up to three days, I'd be scared to sleep and then when I did sleep, I couldn't get up."

"On returning to Germany, the new medical officer realised the state of me, and he issued me with temazepam, which helped me sleep and escape at first but very soon I needed more, and I was hooked. As you probably know, Temazepam is a psychoactive drug which acts on the central nervous system, and I had central nerve damage. This was not a good combination. Sometimes I would see black silhouettes and shapes of creatures and men, creeping out of the corners of the ceiling, whilst I was pinned to the bed thinking I was dying. Other times I would not be able to feel emotion, either happy or sad. Other times I would be confused and have the most painful headaches and I'd be very aggressive. I'd have flashing lights in my head and eyes. I'd sleep for days and still felt as if I hadn't slept in weeks, I developed an anxiety disorder and paranoia."

"I sat lingering in the repeated violence, threats, injuries and violations of my boundaries, personal space and my body when I was trying to sleep, recover and come to terms with what was happening. I had no safe space, no respite."

"... isolated bed rest..."

"... me run on the spot in a small cell or they made me bite through my fingers and pull out my ligaments and bones. This was on top of the dreams in which I'm dying and the sleep paralysis which I had had for many years by now."

"During Kayaking in North Yorkshire, I capsized in rapids on a river. I was trapped under water, smashing my helmet off the rocks. I don't know how long I was under or if I was unconscious. I recall waking with the spray deck smothering my face under water. I think I was pulled out of the kayak by the instructor. This was also a sleeping, hypnagogic flashback of the first sleepwalking/ sleep paralysis weekend in 2004/5 after the trauma in Sennelager."

"experiencing sleep paralysis, it was clear to everyone around me that my brain wasn't operating correctly, and I was experiencing bright flashes when my eyes were closed, mostly when laying on my back"

"his nightmares and bad dreams started - he began to have panic attacks and became scared to fall asleep as he felt as if he was dying in his dreams. He recalled the kayaking and football incidents as well as the RTA. He reported the sleep paralysis to the medics and was given a book on stress at work but no other treatment."

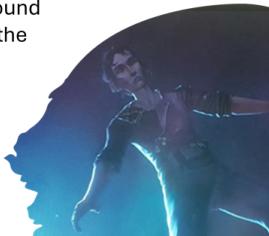
In Bloodborg I use many literary devices, in this example I'll show foreshadowing, circular narratives and juxtaposing two different events in Story Circles, which Arcane copied with Silco and others.

In Bloodborg, In one of my POV Josh said “The grey smoky clouds closed in around me, **devouring me, stealing my breath like a windy assassin.** I crashed into the black water.”

In Arcane, In Silco's drowning monologue, Silco says, "...**it's holding you, whispering in low tones to let it in...**"

In Bloodborg, later Josh said, “I feel as though I’m submerged in icy black water as I lay on my back.”

"...trapping me under in blackness..."



In Bloodborg, I used this cyclical repetition as a literary device to represent dying, reliving of trauma and sleep paralysis.

They've taken this story beat of my trauma and replicated it over and over. We see it used for Silco, Powder, Isha, Jinx, Vander and he's many reincarnations.

"... He recalled the kayaking and football incidents as well as the RTA. He reported the sleep paralysis..."



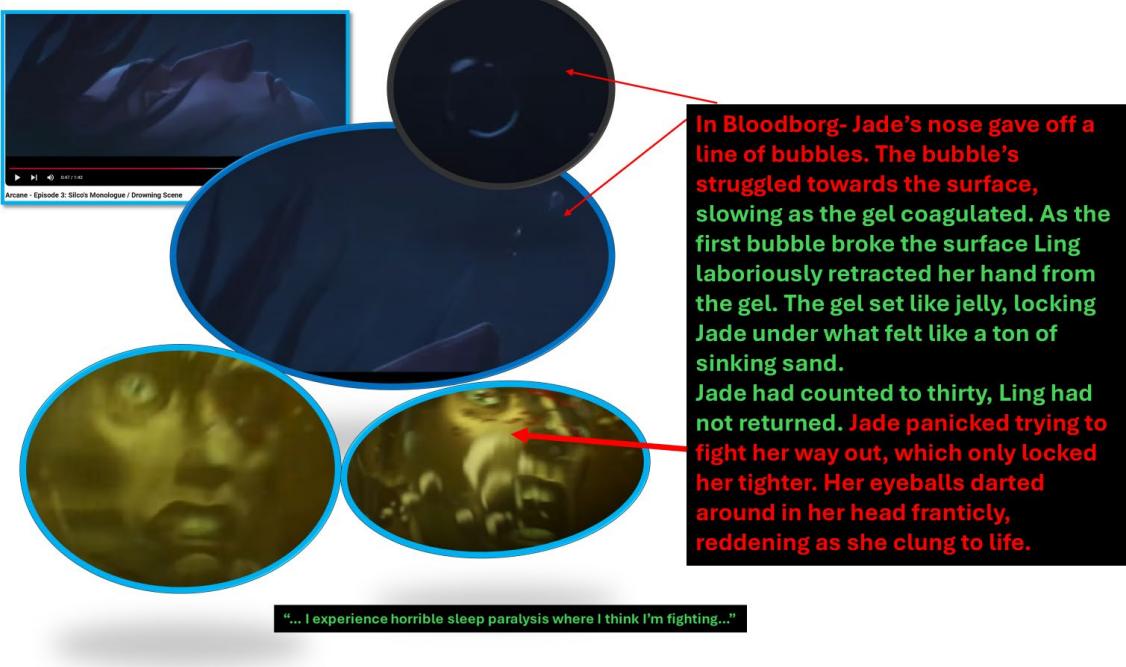
Bloodborg- In another POV of a female character I wrote, “As the man spoke, an emotion she didn’t know and didn’t understand, had been trying to rise in her belly, but each time it washed away, like a wave that never quite reaches the shore. She transfixed onto the blackwater, there was much lurking down there, down in the dark abyss, she felt strangely allied to it; it’s mystery, it’s misery.”



Silco's drowning monologue



Ever wonder what it's like to drown? Story of opposites. There's peace in water. Like it's holding you, whispering in low tones to let it in. And every problem in the world will fade away. But then, there's this thing... in your head, and it's raging. Lighting every nerve with madness. To fight. To survive. And all the while this question lingers before you: "Have you had enough?" It's funny. You could pass a lifetime without ever facing a choice like that. But it changes you forever.



In Bloodborg there is a fight on the tracks and D'borg is stabbed in the belly and falls off the platform. "... landed on a mound of floating black bags full of rubbish. She smashed through the mound and sank deep down into the flood water. The hole in the smog closed."

talk. He experiences varying scenarios eg car crashes, scoring a goal and then everyone jumps on him and he feels as he is suffocating, or parachutes and the parachute smothers him. These "dreams" started 6/12 after the accident. He remembers the first one, which involved a parachute, while he was working in the offr's mess. I suggested that he

In Arcane there is a fight on the tracks and Vander is stabbed in the belly and falls off the platform, landing on a mound of broken glass.



Vi falls, landing on a mound of shimmered up Vander.

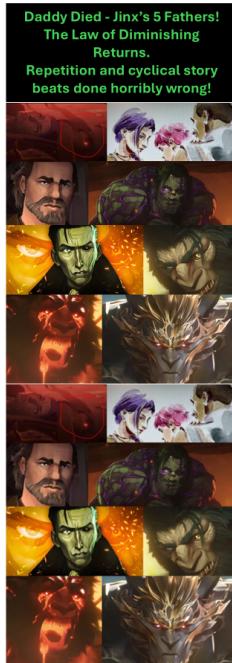


Isha falls, landing on a mound of flesh under clothes, which is Jinx.



Jinx falls, landing on whatever the fifth daddy Vander/Warwick is at this point in the convoluted story.





Connol (Daddy 1) is all but wiped from the story. Jinx and Vi's biological father is afforded not even the respect of an appearance, less for the back of his head in a painting. This is, of course, a complete disrespect to fatherhood.

Daddy Died= 1.

Connol is tossed away, pushed aside, enter daddy 2. Vander (Warwick in Bloodborg) takes the fatherhood role. Yet he only lasts a whole three episodes until he is stabbed and **pushed to his death** by their nemesis, daddy 3 (Silco).

Daddy Died= 2.

But not to fear, as shimmer turns him into Mutated Vander and he survives, enter daddy 2.5. Mutated Vander is killed off 50 seconds later **by falling to his death... again**. Jinx accidentally kills him, or at least created the conditions that killed him.

Daddy Died= 2.5.

Less than three minutes after Jinx sees daddy 2.5's dead body, she leaps into the arms of daddy 3, their nemesis Silco, who had only just stabbed and pushed daddy 2 to his death. Six episodes later, Silco is accidentally shot and killed by Jinx.

Daddy Died= 3

Yeah, daddy 3 is dead, but we see him again in Season 2, can you guess what he's doing? Yeah' you got it... **he's falling / drowning**. But don't worry because he's in water so it's different, oh and he's already dead-dead this time. But not to fear, as Warwick the wolf, daddy 4- who used to be daddy 2- opens his eyes halfway through episode 4 of Season 2. Then in episode 5 of Season 2, the werewolf tracks down Jinx to kill her, but at the end of the episode he remembers he is daddy 2, so he doesn't kill her. Then one episode later, episode 6 of season 2, daddy 4 saves Jinx, then 1 minute later forgets that he is daddy 2 again as he's humanity dies, and he bleeds fire and transforms into a burning werewolf.

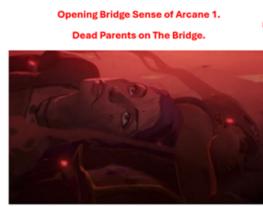
Daddy Died= 4

Daddy 4.5, the burning werewolf, slaps Jinx to the ground with his massive, clawed hand. So, Jinx's new sister Isha - who fell on Jinx- shoots daddy 4.5 with an extremely powerful explosive. The same explosive which is so powerful that it blew up half of an apartment by bouncing against a skirting board. Thus daddy 4.5 is mincemeat.

Daddy Died= 4.5

Not to worry, we see daddy 4.5 again in episode 8 season 2, he has a few scratches and he's asleep whilst he is being made into a Bloodborg. Then in episode 9 daddy 4.5 comes back to life as daddy 5, the Bloodborg werewolf, but he is different because he has a gold head. Alas, he has forgotten Jinx again. Alas, jinx pushes him. Can you guess how he dies? **Bloody falling again!** But not to worry because he might have remembered Jinx again as he fell to his seventh death.

Daddy Died= 5



The Great Bridge Dumping.



In bloodborg:

1. "Looking over the platform rail, Rook gazed down at the red and orange fires littering the gangways."
2. "A barrage of shots drilled through Rook's sleeping mind, producing familiar night terrors."
3. "The toddler sat in a pool of its parents' blood, shaking them both and crying out."
4. "Mum and dad's blood-soaked eyes drilled into Rook's mind."

The bridge crossing and dumping represents crossing the clean, orderly, sane realm into the chaos, manic and disorderly mind. It's a metaphor for the conflicted and fractured mind, trying to cross over into the ordered civilian world after military life and finding an impenetrable wall of difference, and having to dump all the trauma, all the conflict and the stress and worry and all that you have learnt and grown up with and all that you have become. Because you and your military mind is not compatible with civilian life. Thus, the survival mechanisms and coping strategies, and even military language, behaviors, mannerisms and views, need to be dumped with your trauma to successfully cross the bridge into civilized society. Thus, it represents a veteran trying to dump his fractured mind to metaphorically build a bridge to the future.

Example 3

Bridge dumping is a metaphor for trauma, insanity, corruption of the body and mind.

1 Bridge Symbolism relating to Medical Docs
2

3 "One day, I think we were on a road move from Basra to Al Amarah, all the battalion's vehicles were
4 crossing a high steel bridge over the River. I was commanding the section in the back of... call signs
5 Warrior. I was tasked to have my call sign cover the area leading onto the bridge and to guard the
6 convoy around an area of the bridge which was dangerous. The bridge had massive metal plates for
7 the road surface and the plates had moved leaving a massive gap which we could see down to the
8 water. When covering the area ... called me over. Down on the river there was a small boat drifting
9 slowly down stream towards us. The guy seemed to be guiding it over towards our location. The
10 small boat had a large dirty sheet covering whatever it was carrying. I looked through my sights. He
11 had a long-barrelled weapon by his side, between himself and the long oar. ... and I kept our
12 weapons aimed in his general direction until he passed under the bridge, fearing he was going to
13 attack us. I returned to... on the bridge metal plates, as it got darker the gap in the plates became
14 harder to see. We put our torches on and guided the warriors and land rovers away from the gap as
15 they approached, a few stopped to ask us for instructions. One Snatch land rover came speeding up
16 the bend and onto the bridge too fast, it dodged around us (the wrong side) and its front wheel
17 dropped in the gap between the plates and slammed off its axel and bounced back up. As it did the
18 plate slid and the whole thing felt as if it was going to drop. I thought us and the land rover were going
19 to drop to our deaths. The Land rover sped off as if nothing had happened. I told the top cover
20 (gunner) of a nearby warrior, his name was ... He just said, "fucking idiots, I'll report it on coms." That
21 was the last I heard of it."

Exhibit C- Substance -Induced Psychosis

Example 4-Substance-Induced Psychosis

From Medical Docs

"Headaches and pains often lead to sleepless nights for me, which can trigger a lot of psychologically unstable episodes. My head is the most worrying of all my injuries, if I experience anything that diverts my brain from its normal state of homeostasis, I experience headaches and panic /anxiety issues and often I become very irritated, aggressive and sleepless. During these periods, I am hyposensitive to sounds, touch of certain materials and even certain thoughts. Things that can trigger this departure from my normal state are too much coffee, alcohol, drugs both prescription and recreational (there was a time I self-medicated with drugs to try and cope, this no longer happens and didn't happen when I was in the army), too much sleep, not enough sleep, loud noises, stress, certain foods- mostly oily foods, being overloaded, overthinking and even pain."

From Medical Docs

Psychosis of trauma & prescription drugs

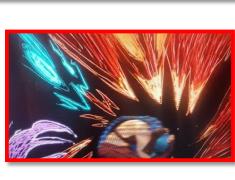
78. If I'm in a room and the radiator is turned up too much, I feel as if I'm being choked. I get panicky, it's almost as if the radiator sucks the oxygen out of the room. If the sun comes out and I'm wearing jeans, I feel restricted and panicky. If I go into a bar and the music is playing too loud, it hurts my head and I get angry, it also hurts my left ear, because of the shape of it after it was reconstructed. If my ex-girlfriend has the hairdryer on, I feel like I'm being attacked. If someone beeps the horn on their car, I feel a burst of blood rush through me which hurts as it's so sudden, I think the pain comes from my central nerve damage. It's endless, I could go on and on writing about these triggers all-day.

The nightmare like dreams where getting worse

... experiencing sleep paralysis, it was clear to everyone around me that my brain wasn't operating correctly, and I was experiencing bright flashes when my eyes were closed, mostly when laying on my back. I became addicted to trying to get fit. Running - on injured legs, became my outlet, which was damaging me even more...

When we got back for Iraq I was told to do the precourse just in case. I then had leave and came back to find I had to do the NCO's Cadre which I was very angry and aggressive towards so I went A.W.O.L for the safety of my own health. Since then I've been very depressed, stressed and aggressive which has had a big effect on both my performance as a soldier and at home. I've started taking all the anger and aggression built up in me home with me and doing stupid things like hitting my drinking every day and fighting.

prescribed temazepam (benzodiazepine highly addictive should be prescribed for short term use only) in 2007. He states he became addicted to the same and when they stopped it he started to secure them illegally. He states he has been taking them since 2007.



35. On returning to Germany, the new medical officer realised the state of me, and he issued me with temazepam, which helped me sleep and escape at first but very soon I needed more, and I was hooked. As you probably know, Temazepam is a psychoactive drug which acts on the central nervous system, and I had central nerve damage. This was not a good combination. Sometimes I would see black silhouettes and shapes of creatures and men, creeping out of the corners of the ceiling, whilst I was pinned to the bed thinking I was dying. Other times I would not be able to feel emotion, either happy or sad. Other times I would be confused and have the most painful headaches and I'd be very aggressive. I'd have flashing lights in my head and eyes. I'd sleep for days and still felt as if I hadn't slept in weeks, I developed an anxiety disorder and paranoia.

1 **Psychosis of trauma & drugs in Bloodborg**

2 “**She jabbed me. I felt nothing.**”

3 “...to take a stress reducer jab.”

4 “**He receives weapons, alcohol and drugs from the**
5 **Assemblage in exchange for raiding services and...**”

6 “**She felt a wave of relaxation and arousal, she had**
7 **felt this feeling before, each time she had been**
8 **injured in fact, it was a side-effect of the**
9 **medication the Air-blades administered her. She**
10 **liked the post-rebuild feeling...**”

11 “Jab himself again in the neck.”

12 “**She stood up and removed her smog mask. She felt dirty and damaged,**
13 **this was a human feeling, is this what human feels like?**”

14 “**I felt bad that I was awake, and they were not.**”

15 “**Her mouth felt watery, D'anna felt the room begin to**
16 **spin like a terrible fairground ride. In her reflection she**
17 **could see her left eye was missing, in its place was a**
18 **cover of skin.**”

19 “**D'borg felt so alive, so energetic when she broke through the**
20 **eye of the storm and arrived at her destination.**”

21 “... given serum jabs by the guards every day.”

22 “**D'anna came around again. She had tubes emerging from every**
23 **orifice. The one protruding out of her mouth, felt warm and wet, like a**
24 **mother's nipple. She felt warm and cosy, like a baby breastfeeding.**”

25 “**I just saw the QM limping about, painfully itching at his leg. He took six jabs**
26 **whilst he spoke, and I bet that they were not Ark approved substances.**”

27 “**It's kinda soothing, like DASRI injections, without**
28 **the arousing side effects. I guess it helps to write,**
29 **like self-healing or something.**”

30 “The injection made the sounds dissipate through her brain, like

31 a gentle whistling wind.”

32 **Psychosis of trauma &**
33 **drugs in Arcane**

34 Jinx's trauma from losing her parents and
35 accidentally killing her adoptive family
36 breaks her and leads to psychosis. She is
37 badly injured. She uses Shimmer (Drugs),
38 aggression, violence and anti-social
39 behaviours to cope, keep her alive, and
40 find a sense of identity and purpose.
41 Sounds familiar!

42 Jinx's mental state deteriorates due to the
43 drug's effects, which causes her to
44 become paranoid and eventually kidnap
45 Vi, Caitlyn, and Silco. Jinx's inner struggle
46 with her new identity continues, and she
47 eventually accepts her fate as Jinx and
48 continues her life of crime.



Exhibit D- Psychosis and mental illness as trauma responses in Bloodborg

and Arcane characters- matched.

Example 5

1, D'borg's psychotic brakes and drug regulation is directly stolen from Jinx. After the tragic events in her childhood, Jinx experiences hallucinations, paranoia, and dissociation. Her erratic behaviours and violent tendencies are closely entwined to her unresolved guilt and loss.

2, In Bloodborg, Rook is a resilient and strong leader to her adoptive family, just as Vi is. Yet her actions lead to her two adoptive brothers being killed, one with a pole impaled through his body, exactly the same as Jinx's actions lead to the death of her two brothers. Mylo was impaled through his body. Rook has to deal with this trauma and aggression and survivor's guilt. While Vi is resilient, she has to deal with intense trauma, survivor's guilt, and post-traumatic stress. Her anger and impulsivity often surface as coping mechanisms. In Vi we see the same coping strategies as Warwick In Bloodborg. Those being Pit fights, isolation, alcohol abuse, existential nihilism and self-neglect.

3, Jayce's personality and appearance change after he escapes "the anomaly," and he appears to suffer from mental disturbance. This is stolen from Warwick's struggles of the same after he has been transported away after the "Rupture" event. - Same, same!



4, In Bloodborg, a sniper called Josh suffers PTSD flashbacks of head shot kills. It's all too much for Josh, he is soon sick of the killing and the mayhem of war, he has to go AWOL because he can't take much more. In Arcane, this is directly lifted for Caitlyn Kiramman who suffers flashbacks in season 2. Caitlyn experiences significant stress and moral dilemmas, showing signs of burnout from her role as an enforcer.

5, In Bloodborg, Cowboy Momahan, the leader of the Feral Fighters, has vowed to unite the gangs, the hunters and raiders of The Needles district, to fight against other districts, for full control of New Kowloon. He has announced that he will be the first King of New Kowloon. He is a Narcissistic violent and cruel scrawny rat of a man, barely kept in check with inhaled neurotransmitter drugs. In Arcane Silco demonstrates signs of narcissism and paranoia. His obsession with power and control, along with his delusions of grandeur, reflect deep psychological scars from betrayal and loss. He self regulates in the same way, yet he injects the drug into his eyeball. Silco is a subtle and more poised, dialed down version of Cowboy Momahan.

6, Viktor's declining health and obsession with Hextech lead to signs of depression, existential dread, and obsession. His isolation and desperation reflect the psychological toll of his condition. This is taken from Simon's conditions, as well as his father Chris Redgrave's conditions and psychological state. I also wrote elements of a desire to be something better and to have an unbroken body into Roy the Robot's psychological state. Roy suffers from body dysmorphia and desires a transformation, just as we see in Viktor.

7, Ambessa Medarda is devoid of sentimentality, which could suggest a form of emotional detachment or desensitization developed through tragic loss, years of hardship and violence. Her character embodies traits of emotional repression, ruthlessness, and a survivalist mindset. This psychological state is taken from Neva, an African tribal leader who lost a child, which is my direct trauma writing of the tragic loss of my niece.



Psychosis and mental illness as trauma responses in Bloodborg and Arcane characters- matched

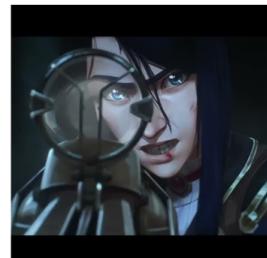


Exhibit E- Post-Traumatic Amnesia and flashback-like intrusions.

ditch. He has no recollection of the event or the preceding week having been

[REDACTED] He states he still has no recollection of the accident. His first memory he states was waking up in hospital and he was pulling off the tubes attached to him.

“memory is very limited of the actual sequence of events which followed, and some had been pieced together from what he was told subsequently”

knocked unconscious in the collision and transferred to ITU for controlled PEEP ventilation after

head injury, which involved a period of amnesia for a week prior to the event and treatment in IGU with ventilation. He afterwards suffered from vertigo and

the following problems. Anger management, ongoing low back pain, and ongoing anterior leg pain, right worse than left with continued pain management issues. He is left with chronic post-traumatic headache, which can affect his concentration, and persistently disturbed sleep, resulting in tiredness. He is waiting for an appointment at the sleep disorder clinic.

<p>Zur Sache</p> <p>Ich gebe dir mir vorgeworfen Tat zu: I admit to the offence of which I have been accused</p>	<p>Details of the offence:</p> <p><input checked="" type="checkbox"/> ja yes</p> <p><input type="checkbox"/> nein no</p> <hr/> <p><u>Due to the nature of my ingression, I have no recollection of events leading up to the incident.</u></p> <hr/> <hr/> <hr/> <hr/>
---	--

ventilation after

[Redacted box]

[Redacted box]

[Redacted box]

Ort, Datum, datum, place

[Redacted box]

(Unterschrift, signature)

[REDACTED] describes only a vague recall of the final two weeks of his admission. At the time of discharge he said he was on medication for headaches and had pains in his back and neck. He reported having suffered bruising to his stomach and chest. There were particular difficulties relating to his right leg injuries. [REDACTED]

Post-Traumatic Amnesia and flashback-like intrusions in Bloodborg.

“The bang of each shot jumped through my body, flashing me back. Head-hopping between times...”

“She glitched back to another time. In her flashback a blonde girl lay before her, mutilated. The fear in her eyes floored D’borg. She lay beside the black-haired girl, gurgling on the rain, believing it to be blood. D’borg screamed. The black-haired girl, reached out, grasping D’borg’s fingers. D’borg met the embrace, holding the girl’s hand. They lay on their backs, peering up at the stars.”

"Her limbs felt as if they were on fire. Her droopy right eye shot open wide. Flashes of burning bodies falling from the sky burnt into her mind, she flickered back to under the ring road. Bodies smashed against the floor all around her bed. She struggled to breathe; her right lung ached as if an elephant was standing on her chest. She passed out."

"D'borg flashed back to being human. Pain, an intense pain in her head. She was pinned to the ground, faced down, unable to move."

"As I sprinted across the dust field, I kept seeing flashes of the man lying in the road, his face scrunched up and his back bloody, I kept flashing back to the giant tanks of blood."

1 More -

2 **Post-Traumatic Amnesia and flashback
like intrusions in Bloodborg.**



3 "Slush ran through Chris's shuddering body. He edged
4 towards the verandah. Flashes of Dillon James's bloody
5 mangled corpse on the rocks below, pulsed through
6 Chris's mind."



7 A tear dropped from her human right eye. She cried in pain. The physical pain
8 hurt but the psychological pain and trauma, cut deeper than any sword could
possibly slice, this pain slit into her soul. D'borg remembered, she
remembered everything.

9
10 "A thump at the door tore away the world. A flash of blood, a pulse of doom, a
11 reek of death. Back on the wall where many died- The explosion, The Rupture.
Chris lay on his back amongst the debris of the blast. Warmth trickled from
his ringing ears. Unable to move, he peered at the massive hole in The Wall."

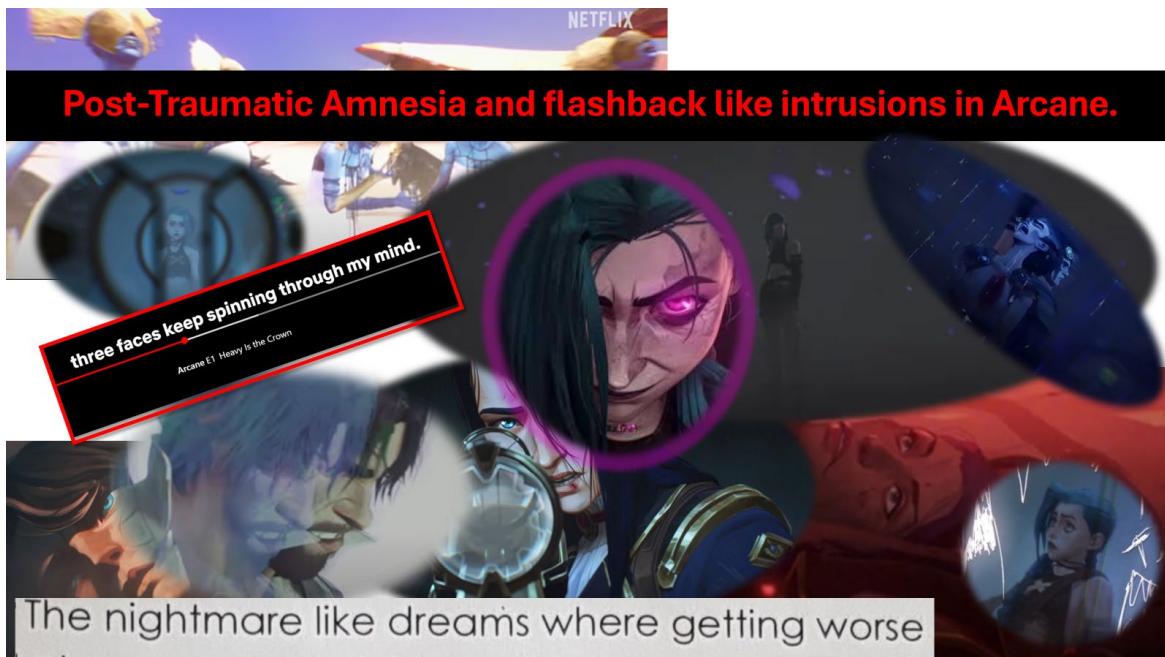
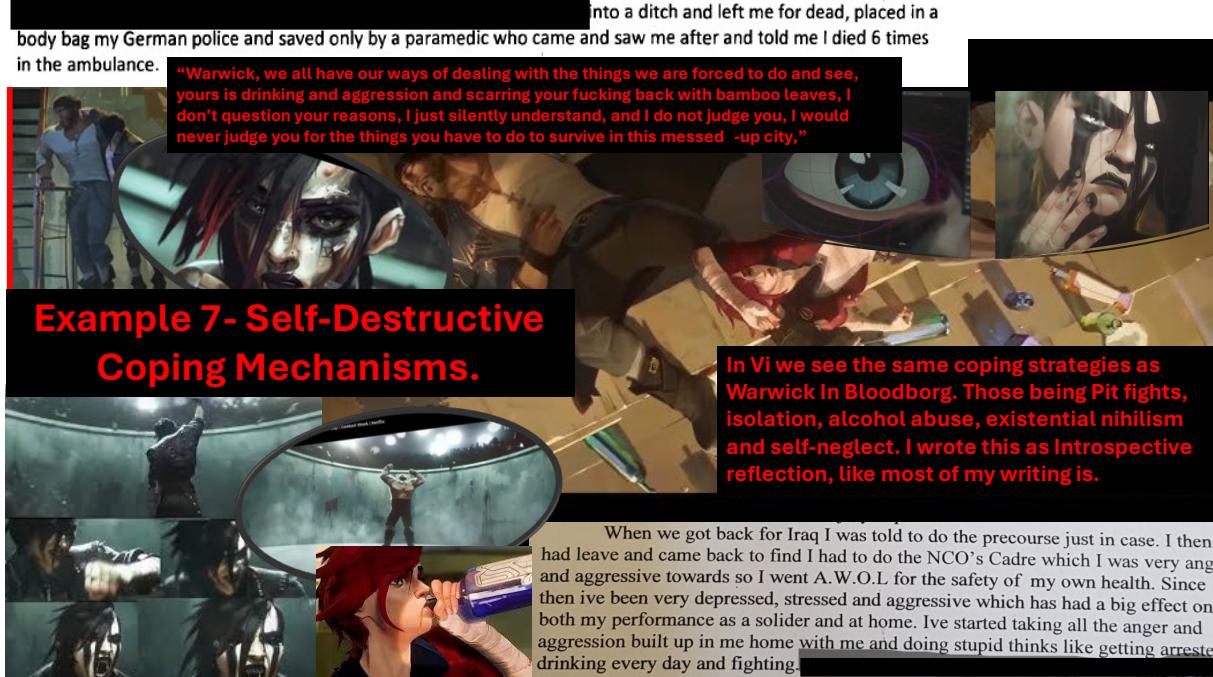


Exhibit F-Trauma Gaslighting



Look at all the M.Ws in these single frames.

Exhibit G - Self-Destructive Coping Mechanisms.



When we got back for Iraq I was told to do the precourse just in case. I then had leave and came back to find I had to do the NCO's Cadre which I was very angry and aggressive towards so I went A.W.O.L for the safety of my own health. Since then I've been very depressed, stressed and aggressive which has had a big effect on both my performance as a soldier and at home. I've started taking all the anger and aggression built up in me home with me and doing stupid things like getting arrested drinking every day and fighting.

Exhibit G- Tragic Death (loss) of Plaintiff's Niece.

Example 8 -Tragic Death (loss) of my Niece.

**Arcane: Season 2 | "Blood, Sweat & Tears" |
Music Video | Netflix**

Rebirth after losing a child!

This is sick, because this scene is deeply personal to me and my family.

This too is stolen from [Bloodborg: The Harvest by M.W. Wolf](#). The semi-psychadelic dream like sequence is [Neva](#) in a drug induced sleep realm searching the higher consciousness for her daughter [Sabella](#).



The worst of all is Neva- Leader of the Tribe's POV, which was taken to build Ambessa and Mel's storylines and characters as well as the "Blood, Sweat & Tears" music video. Neva- Leader of the Tribe's POV is written about the tragic death (loss) of my niece when she was 3.5 years old. She was half Ugandan. The lost child which the young Ambessa is searching for in the higher consciousness in the music video, is a direct reference to the loss of my niece. This is why this POV is called African Child.

I wrote in Bloodborg:

'She's not up there, Sabella isn't inside Mother Gaia, I've searched the higher

consciousness day and night for two weeks

Perhaps she isn't ready to be contacted.



When Inocence dies, a wolf is reborn. None of this came from your weak link. He is playing with fire and will get burnt.



Arcane: Season 2 | "Blood, Sweat & Tears" | Music Video | Netflix
(Purple or Blue people, no eyes)

In Bloodborg I wrote.

...stayed well clear of Chinotimba and the other cities. The infected and mutated people inhabited the cities. The biochemical creatures spread diseases and death in those places."



"Some even **hunted Rozwi people for their eyes**, believing that by swallowing the eyeballs of Rozwi purebred, they would gain vitality and be saved in the afterlife by the power of the **worlds inside the eyeballs.**"

“The horizon warmed with orange and red, As Neva was greeted at the village gates by two lines of warriors. An Elder held out a sharp down-pointing beak of a vulture. Neva pressed the point of the beak into the exposed chest of the warriors she had selected to dance for her.

As the warrior's danced around the village fire, Neva looked out across the rich orange horizon and imagined what it would have been like in the epoch of giraffes and elephants. Skeletons of trees pierced the dead earth, and human bones littered the land, reminding Neva that Mother Gaia was approaching her end-stage.

A warrior kicked the embers braking Neva's reverie."



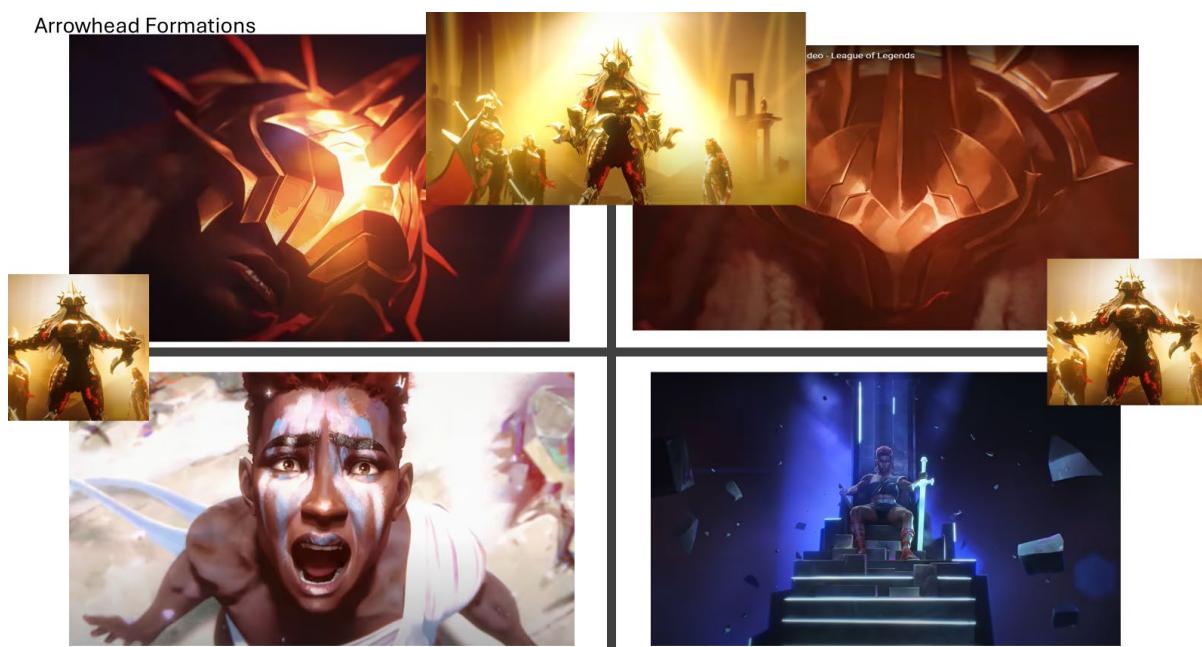
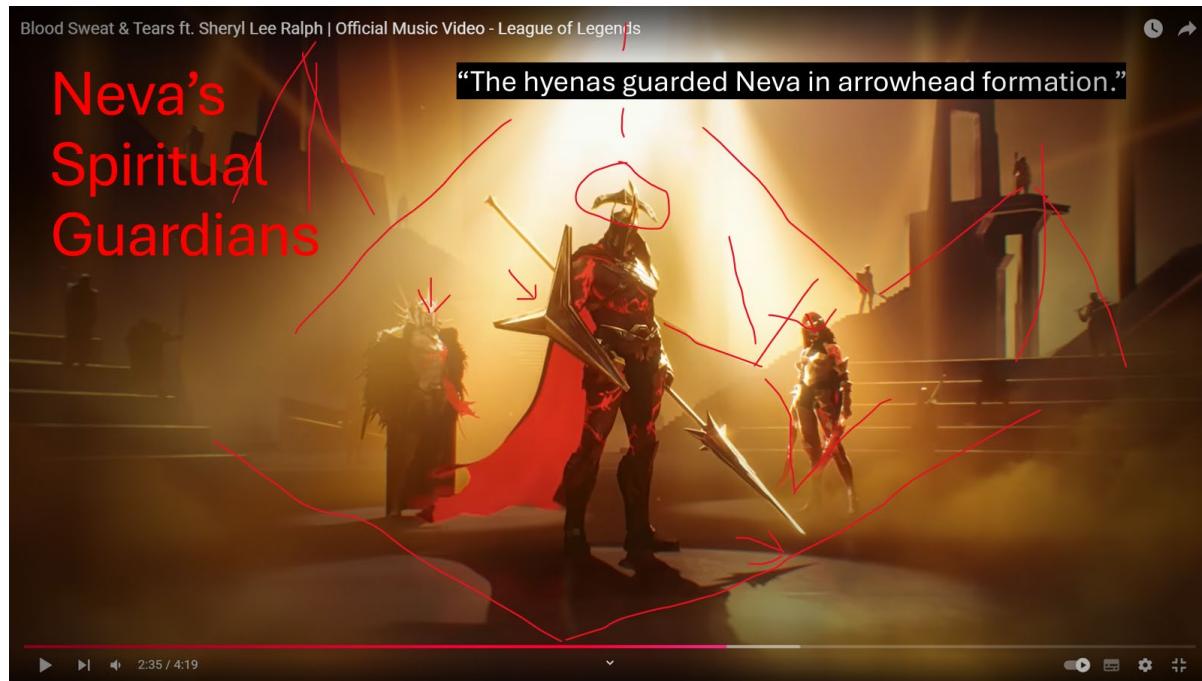
Arrowhead Formation

Arcane: Pregnant and shot in the belly, perhaps losing a child,
In Bloodborg: Neva also lost a child. I used foreshadowing to hint to the readers what happened.

"Three hyenas licked Neva's exposed swollen breasts as milk leaked from them. Neva thrust the beasts aside and sat up. She wiped the tears from her face with a cloth-sling which was intended to carry Neva's new-born daughter, Sabella.

Neva wiped the hyena drool from her breasts and stood up, prepared to receive her tribesman. Neva whistled and the three Hyena's sprang to attention. The hyenas guarded Neva in arrowhead formation"





1
2 'Chieftain, do you want to see them dance once more,' said
Elder Regua, bowing in front of Neva.

3 'No, I've seen enough. I choose only two. Warrior T'agon and
Warrior



The Three Hyenas



15 **Hyena Skulls hung on a banner, across her left shoulder.
Under is a "cloth-sling, which was intended to carry
Neva's new-born daughter, Sabella."**



20 On her back she strapped her double-end steel blade

... in the mouth of her cave-dwelling which burrowed into a dry
wall of a gorge close to where the once-great attraction stood. The
blazing sun shone into h in the mouth of her cave-dwelling which
burrowed into a dry wall of a gorge close to where the once-great
attraction stood. The blazing sun shone into her blue-grey eyes. er
blue-grey eyes.



“She came to my cave as I drifted in the consciousness looking for Sabella. She told me I’d be going on a great journey to save her. To save you all.”

The white eyed child of great importance.

“... had gleaming, brilliant white eyes.”

Blood Sweat & Tears ft. Sheryl Lee Ralph | Official Music Video - League of Legends

Exhibit H- Plaintiff missing much of his daughter's babyhood.

Example 9- Missing much of my daughter's babyhood.



From Bloodborg

"... my boy, you took my Peter."

“... killed my wife and son...”



1 Exhibit I- Post war / service anxieties over geopolitical affairs.
2

3 **Example 10- Post war / service anxieties over geopolitical affairs.**

4 Trumps walls and the growing divide between left and right, east and west, rich and poor.

5 The whole of the Bloodborg series is clearly a metaphor of my trauma and my concerns of
6 geopolitical affairs, such as war & conflict, terrorism, radicalisation, blind obedience,
oppression, division of people and unchecked capitalism, bleeding the world dry.



7 **Bloodborg is also
8 a depiction and
9 study of mental
10 illness of many
11 kinds.**



15 The three districts of New Kowloon are a metaphor for the struggle of emotional regulation.



16 Needles is too sharp, too chaotic, too stabby, too much
17 going on. It represents a manic high.

18 The mouth district is like
falling into a mouth, its
consuming, devouring, its
black, deep and dark, it
represents depression,
hiding away, and sorrow.
The mouth is ordered
dullness of the mind.



19 The district between them is the
balance which we all seek, the light!
It's the shining brightly lit buildings
between the two extremes, its where
living can, and does, happen. It's the
vices, the fleeting people and fleeting
happiness. The Tetris blocks shine
and fade, always swaying, always
coming, always going, but they do
provide light and warmth and shelter,
while it lasts.

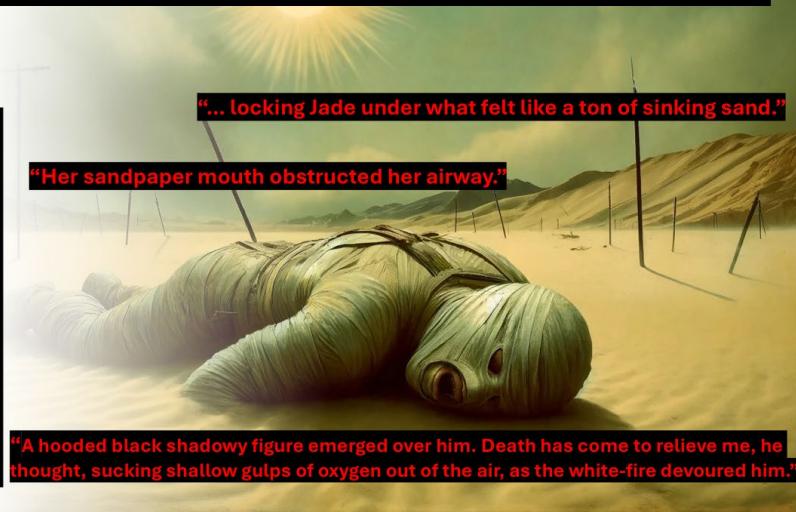
20 From Bloodborg- "He looked past the buildings of The Mouth, to the district he calls Tetris, after a handheld videogame which he found
in an old museum on one of the lower platforms. The district is more commonly known as Solarscape or Midcity. The Solarscape district has
power, thus the buildings are brightly lit, like the blocks in his videogame."

21 Amongst the studded buildings in the far ground, an area of needles pricked the heavens. Needles is a smaller area, only six blocks wide by
six blocks long. Needles is one of the most avoided areas of New Kowloon because a feared gang of lawless wreckers, rapist and murderers
patrol the platforms and gangways. They call themselves The Feral Fighters. The leader of the gang; Cowboy Momahan, is attempting to take
control of all of The Needle district."

1 This is why Riot are 100% not getting away with copyright infringement of my trauma writing. I
2 shouldn't have to consult my medical docs to prove this infringement, it's damaging, and Riot
3 will pay for the damage. It's a matter of how, how much, how unpleasant, and when.
The sooner the better.

4

5 From my Medical Docs- I finished
6 the tour on full duties and by the
time I left Iraq my legs and back
7 were so bad; I spent two weeks in
bed in Germany before returning
home to England on leave. Just
8 trying to rest my injuries the best I
could. During these two weeks, I
9 had a nightmare about someone
cutting off my arms and legs and
tying me to the desert floor in the
baking sun and my skin burning in
the sun. My lips ripped open as
they dried out and I was desperate
10 for water.



Attachment

For more accessible viewing and evaluating, The Plaintiff has filed a PDF attachment of **Psycho-Emotional Analysis of Trauma in Arcane. Taken from Bloodborg, which is trauma writing directly referencing my past and my medical records, to accompany this court document.**

Declaration of Truth Regarding Presented Evidence

I, Marc Wolstenholme, hereby declare under penalty of perjury under the laws of the United States and the State of California, that the information and evidence provided in the document titled Detailed Comparison of Bloodborg and Arcane: Alleged Infringement of Trauma Writing are true and accurate to the best of my knowledge and belief.

The examples and claims outlined, including specific comparisons, psycho-emotional parallels, and character analyses, are based on:

1. My original written work, Bloodborg;
 2. My personal medical records and trauma writing;
 3. Observations and analysis of Arcane by Riot Games;
 4. Personal experiences and creative efforts documented within Bloodborg.

This declaration is made in good faith to assert the authenticity of the provided material and its origin. All evidence cited and discussed reflects my own experiences, observations, and creative expressions.

The Plaintiff, Marc Wolstenholme, M.W. Wolf.

Date: JANUARY 29, 2025

Signed: M. WOLSTENHOLME